

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

GREETING CARD ASSOCIATION INTERROGATORIES TO THE
UNITED STATES POSTAL SERVICE (I)

Pursuant to Order No. 5875 and 39 CFR sec. 3020.116, the Greeting Card Association (GCA) submits interrogatories and/or requests for documents, as follows:

Institutional interrogatories to the United States Postal Service – GCA/USPS-1

The term “documents” includes (without limitation) letters, memoranda, telegrams, reports, studies, articles from periodicals, speeches, testimonies, books and extracts from books, pamphlets, tabulations, and work papers. In terms of format, “documents” includes written or printed records and disks, tapes, portable drives, or other recorded media, together with such written or printed material as is necessary to understand and use such disks, tapes, drives or other recorded media.

Any part of these interrogatories may be re-directed to a Postal Service witness, as necessary.

May 12, 2021

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-1

1. (a) For each First-Class Mail product, as listed on the Cost Segment 14 page of the FY 2020 *Public Cost Segments and Components* report, please provide the piece volume for each mode of transportation shown on that page.

(b) Please confirm that an acceptably accurate per-piece cost for each First-Class Mail product and mode of transportation can be calculated by dividing the Cost Segment 14 cost therefor shown in the FY 2020 *Public Cost Segments and Components* report by the respective piece volumes requested in part (a). If you do not confirm, please state the reason(s) and explain how such a per-piece cost should be calculated.